

Review Requirement	Regulatory Authority	Compliance Standard	SERFF Submission Requirements	SERFF Supporting Documentation - Justifications, if applicable	Resources - QHP Application Instructions, Templates, Justifications
<b>Program Attestations</b>		Must attest to meeting all program requirements.	QHP Application - Program Attestations Section.	Compliance Plan and Organizational Chart Cover Sheet.	<a href="http://www.serff.com/documents/plan_management_data_instructions_ch2.pdf">Program Attestations Instructions</a> <a href="http://www.serff.com/documents/plan_management_data_instructions_ch2.pdf">http://www.serff.com/documents/plan_management_data_instructions_ch2.pdf</a> <a href="http://www.serff.com/documents/plan_management_data_instructions_ch2.pdf">Compliance Plan and Organizational Chart</a> <a href="http://cciio.cms.gov/programs/Files/compliance-plan-org-chart-checklist-rev-04-03-2013.pdf">http://cciio.cms.gov/programs/Files/compliance-plan-org-chart-checklist-rev-04-03-2013.pdf</a>
<b>Licensure</b>	45 CFR 156.200(b)(4)	Must be licensed by ODI.	Program Attestations. Attestation to meeting licensure requirements.	No supporting documentation required. ODI will verify licensure.	<a href="http://www.serff.com/documents/plan_management_data_instructions_ch3.pdf">Instructions for Licensure Application Section</a> <a href="http://www.serff.com/documents/plan_management_data_instructions_ch3.pdf">http://www.serff.com/documents/plan_management_data_instructions_ch3.pdf</a>
<b>Solvency</b>	45 CFR 156.200(b)(4)	Must be in good standing with the State of Ohio.	Program Attestations. Attestation to meeting solvency requirements.	If issuer is not in good standing, the insurer will be required to submit a description/justification how the insurer will comply with Ohio solvency requirements and respond to corrective actions.	<a href="http://www.serff.com/documents/plan_management_data_instructions_ch4.pdf">Instructions for Good Standing Section</a> <a href="http://www.serff.com/documents/plan_management_data_instructions_ch4.pdf">http://www.serff.com/documents/plan_management_data_instructions_ch4.pdf</a>
<b>EHB</b>	42 USC §18022 45 CFR 156.115	Must offer coverage that matches the coverage offered by the Ohio Benchmark plan. Allowable alternates: 1. Substantially equal 2. Actuarially equivalent substitutions 3. Exceeding the Ohio Benchmark plan	Program Attestations. Attestation of compliance with Benefit Design standards. Plans and benefits template - Benefit package section. Includes high-level information regarding the plans, as well as a list of benefits with any quantitative limits or exclusions.	EHB Substituted Benefit Justification.	<a href="http://www.serff.com/documents/plan_management_data_instructions_ch10.pdf">Instructions for Plans and Benefits Template</a> <a href="http://www.serff.com/documents/plan_management_data_instructions_ch10.pdf">http://www.serff.com/documents/plan_management_data_instructions_ch10.pdf</a> <a href="http://www.serff.com/documents/plan_management_data_templates_plans_benefits.xlsm">Plans and Benefits Template</a> <a href="http://www.serff.com/documents/plan_management_data_templates_plans_benefits.xlsm">http://www.serff.com/documents/plan_management_data_templates_plans_benefits.xlsm</a> <a href="http://www.serff.com/documents/plan_management_data_templates_plans_benefits.xlsm">EHB - Substituted Benefit Justification</a> <a href="http://www.serff.com/documents/plan_management_data_templates_plans_benefits.xlsm">http://www.serff.com/documents/plan_management_data_templates_plans_benefits.xlsm</a>
<b>Prescription Drugs</b>	45 CFR 156.120	Must ensure that plan covers the greater either one drug in every USP category OR the same number of drugs in each category and class as the Ohio benchmark plan, whichever is greater.	Program Attestations. Attestation of compliance with Benefit Design standards. Prescription drug formulary template. Collects formulary data for plans.	Formulary - Inadequate category/class count justification. Identifies reasons for an inadequate count in a particular category or class.	<a href="http://www.serff.com/documents/plan_management_data_instructions_ch12.pdf">Instructions for Prescription Drugs Template</a> <a href="http://www.serff.com/documents/plan_management_data_instructions_ch12.pdf">http://www.serff.com/documents/plan_management_data_instructions_ch12.pdf</a> <a href="http://www.serff.com/documents/plan_management_data_templates_prescription_drug.xls">Prescription Drugs Template</a> <a href="http://www.serff.com/documents/plan_management_data_templates_prescription_drug.xls">http://www.serff.com/documents/plan_management_data_templates_prescription_drug.xls</a> <a href="http://www.serff.com/documents/plan_management_data_templates_prescription_drug.xls">Formulary Justification</a> <a href="http://www.serff.com/documents/plan_management_data_templates_prescription_drug.xls">http://www.serff.com/documents/plan_management_data_templates_prescription_drug.xls</a>
<b>Annual Limitation of Benefit Cost Sharing</b>	42 USC §18022 45 CFR 156.130(a)	Cost-sharing shall not exceed the dollar amounts in effect under section 223(c)(2)(A)(ii) of the Internal Revenue Code of 1986 for self-only and family coverage.	Program Attestations. Attestation of compliance with annual limitations on cost-sharing. Plans and benefits template - Cost share variances section. Allows insurers to provide Deductibles and Maximum Out of Pocket information for In/Out/Combined Networks, for both Individual and Family, as well as In/Out/Combined Network Copays and Coinsurances.	Justification for Exceeding Annual Limitation on Cost-Sharing.	<a href="http://www.serff.com/documents/plan_management_data_instructions_ch10.pdf">Instructions for Plans and Benefits Template</a> <a href="http://www.serff.com/documents/plan_management_data_instructions_ch10.pdf">http://www.serff.com/documents/plan_management_data_instructions_ch10.pdf</a> <a href="http://www.serff.com/documents/plan_management_data_templates_plans_benefits.xlsm">Plans and Benefits Template</a> <a href="http://www.serff.com/documents/plan_management_data_templates_plans_benefits.xlsm">http://www.serff.com/documents/plan_management_data_templates_plans_benefits.xlsm</a> <a href="http://www.serff.com/documents/plan_management_data_templates_plans_benefits.xlsm">Justification for Exceeding Annual Limitation on Cost-Sharing</a> <a href="http://www.serff.com/documents/plan_management_data_templates_plans_benefits.xlsm">http://www.serff.com/documents/plan_management_data_templates_plans_benefits.xlsm</a>
<b>Annual Limitation on Deductibles (SHOP only)</b>	42 USC §18022 45 CFR 156.130(b)	Complies with Annual Limitations on Deductibles for Employer-Sponsored Plans.	Program Attestations. Attestations of compliance with annual limitations on deductibles. Plans and benefits template - Cost share variances section. Allows insurers to provide Deductibles and Maximum Out of Pocket information for In/Out/Combined Networks, for both Individual and Family, as well as In/Out/Combined Network Copays and Coinsurances.	Justification for Exceeding Small Group Deductibles Limitation.	<a href="http://www.serff.com/documents/plan_management_data_instructions_ch10.pdf">Instructions for Plans and Benefits Template</a> <a href="http://www.serff.com/documents/plan_management_data_instructions_ch10.pdf">http://www.serff.com/documents/plan_management_data_instructions_ch10.pdf</a> <a href="http://www.serff.com/documents/plan_management_data_templates_plans_benefits.xlsm">Plans and Benefits Template</a> <a href="http://www.serff.com/documents/plan_management_data_templates_plans_benefits.xlsm">http://www.serff.com/documents/plan_management_data_templates_plans_benefits.xlsm</a> <a href="http://www.serff.com/documents/plan_management_data_templates_plans_benefits.xlsm">Justification for Exceeding Small Group Deductibles Limitation</a> <a href="http://www.serff.com/documents/plan_management_data_templates_plans_benefits.xlsm">http://www.serff.com/documents/plan_management_data_templates_plans_benefits.xlsm</a>

<b>Limited Cost Sharing Plan Variation (Only required under limited circumstances)</b>	45 CFR 156.430(a)(2)(i)	Required for issuers that are requesting a CSR advance payment for at least one limited cost sharing plan variation. Documentation certifies that an insurer has followed the CMS standards for developing limited cost sharing CSR advance payment estimates. Meets the requirement at 45 CFR 156.430(a)(2)(i) for QHP issuers that choose to seek advance payments for a limited cost sharing plan variation.	Program Attestations. Attestation of compliance with Limited Cost Sharing Plan Variations, as applicable.	Limited Cost Sharing Plan Variation - Estimated Advance Payment Supporting Documentation and Justification.	<u>Limited Cost Sharing Plan Variation - Estimated Advance Payment Supporting Documentation and Justification</u> <a href="http://www.serff.com/documents/plan_management_data_instructions_ch13i.pdf">http://www.serff.com/documents/plan_management_data_instructions_ch13i.pdf</a>
<b>Rate Review</b>	45 CFR 155.1020 45 CFR 156.210		Program Attestations. Attestation of compliance with Rates standards. Rates Business Rules Templates. Rate Tables Template. Unified Rate Review Template (URRT).	Actuarial Memorandum.	<u>Rates Business Rules Template</u> <a href="http://www.serff.com/documents/plan_management_data_templates_business_rules.xls">http://www.serff.com/documents/plan_management_data_templates_business_rules.xls</a> <u>Rate Tables Template</u> <a href="http://www.serff.com/documents/plan_management_data_templates_rates.xls">http://www.serff.com/documents/plan_management_data_templates_rates.xls</a> <u>URRT Template</u> <a href="http://www.serff.com/documents/plan_management_data_templates_unified.xlsm">http://www.serff.com/documents/plan_management_data_templates_unified.xlsm</a> <u>Actuarial Memorandum Instructions</u> <a href="http://www.serff.com/documents/plan_management_data_templates_help_partIII_actuarial_memo.pdf">http://www.serff.com/documents/plan_management_data_templates_help_partIII_actuarial_memo.pdf</a>
<b>Actuarial Value Standards</b>	45 CFR 156.135	Offers plan at metal levels specified in federal regulations.	Program Attestations. Attestation of compliance with rate standards. Plans and benefits template. The Plans & Benefits template will use the AVC to calculate AVs for all standard, non-catastrophic plans, all silver plan CSR variations, and all limited cost sharing plan variations.	Unique plan design supporting documentation and justification. Describes the reasons a plan qualifies as unique and the methods used to calculate actuarial value when AV calculator cannot accommodate a plan. <a href="http://www.serff.com/documents/plan_management_data_instructions_ch13a.pdf">http://www.serff.com/documents/plan_management_data_instructions_ch13a.pdf</a>	<u>Instructions for AV Calculator</u> <a href="http://www.serff.com/documents/plan_management_data_instructions_ch11.pdf">http://www.serff.com/documents/plan_management_data_instructions_ch11.pdf</a> <u>AV Calculator</u> <a href="http://ccio.cms.gov/resources/files/av-calculator-final.xlsm">http://ccio.cms.gov/resources/files/av-calculator-final.xlsm</a> <u>Unique Plan Design Supporting Documentation</u> <a href="http://www.serff.com/documents/plan_management_data_instructions_ch13a.pdf">http://www.serff.com/documents/plan_management_data_instructions_ch13a.pdf</a>
<b>Network Adequacy</b>	45 CFR §155.1050; 45 CFR 156.230	Network must include sufficient number and types of providers (including providers that treat substance abuse and mental health conditions) to ensure that all services are available without unreasonable delay.	QHP Application - Network Adequacy section. Network ID Template. Access Plan and Cover Sheet Template (for PPO/Indemnity QHPs only).		<u>Instructions for Network Adequacy Application Section</u> <a href="http://www.serff.com/documents/plan_management_data_instructions_ch6.pdf">http://www.serff.com/documents/plan_management_data_instructions_ch6.pdf</a> <u>Network Adequacy Access Plan and Cover Sheet</u> <a href="http://ccio.cms.gov/programs/Files/access-plan-cover-sheet-template-rev-4-12-2013.pdf">http://ccio.cms.gov/programs/Files/access-plan-cover-sheet-template-rev-4-12-2013.pdf</a> <u>Instructions for Network ID Template</u> <a href="http://www.serff.com/documents/plan_management_data_instructions_ch8.pdf">http://www.serff.com/documents/plan_management_data_instructions_ch8.pdf</a> <u>Network ID Template</u> <a href="http://www.serff.com/documents/plan_management_data_templates_network.xls">http://www.serff.com/documents/plan_management_data_templates_network.xls</a>
<b>Essential Community Providers (ECP)</b>	45 CFR 156.235	Network must include sufficient number and geographic distribution of ECPs, where available to ensure reasonable and timely access to a broad range of ECPs.	ECP Template. Attestation of compliance with either of the ECP standards: Safe-Harbor; Minimum Expectation; or Alternative Issuer..	Supplemental ECP response form.	<u>Instructions for ECP Template/Application Section</u> <a href="http://www.serff.com/documents/plan_management_data_instructions_ch7.pdf">http://www.serff.com/documents/plan_management_data_instructions_ch7.pdf</a> <u>ECP Template</u> <a href="http://www.serff.com/documents/plan_management_data_templates_eep.xls">http://www.serff.com/documents/plan_management_data_templates_eep.xls</a> <u>Supplemental ECP Response Form</u> <a href="http://ccio.cms.gov/programs/Files/eep_supplemental_response_Form_03_08_13.pdf">http://ccio.cms.gov/programs/Files/eep_supplemental_response_Form_03_08_13.pdf</a>
<b>Service Area</b>	45 CFR 155.1055	The service area of a QHP must be at a minimum an entire county, or a group of counties, unless the Exchange determines that serving a smaller geographic area is necessary, nondiscriminatory, in the best interest of qualified individuals and employers, and was established without regard to racial, ethnic, language, health-status related factors, or other factors that exclude specific, high utilizing, high cost, or medically underserved populations.	Program Attestations. Attestation of compliance with Service Area standards. Service area template.	Partial service area justification. No specific form. However, detailed partial service area justification required if service area does not include entire county. Insurer is required to follow service area instructions regarding what information must be included in the justification.	<u>Instructions for Service Area Template Instructions</u> <a href="http://www.serff.com/documents/plan_management_data_instructions_ch9.pdf">http://www.serff.com/documents/plan_management_data_instructions_ch9.pdf</a> <u>Service Area Template</u> <a href="http://www.serff.com/documents/plan_management_data_templates_service_area.xls">http://www.serff.com/documents/plan_management_data_templates_service_area.xls</a>

<b>Accreditation</b>	45 CFR 156.275	Must comply with FFE timeline for accreditation. Accreditation requirement satisfied if insurer is accredited by NCQA or URAC. If insurer is not accredited by NCQA or URAC, insurer may submit existing commercial or Medicaid accreditation for policies and procedures comparable to QHPs. If no URAC, NCQA or existing commercial or Medicaid accreditation, insurer must have plans to gain accreditation by an entity recognized by HHS.	Program Attestations. Attestation of compliance with Accreditation standards. Accreditation section of QHP application. NCQA/URAC Templates, as applicable.	If insurer submits NCQA or URAC Accreditation, insurer must submit accreditation certificates or ISS reports. If issuer does not submit existing NCQA or URAC attestation, insurer must explain how it is meeting the accreditation timeline requirement.	<u>Instructions for the Accreditation Application Section</u> <a href="http://www.serff.com/documents/plan_management_data_instructions_ch5.pdf">http://www.serff.com/documents/plan_management_data_instructions_ch5.pdf</a> <u>NCQA Accreditation Template</u> <a href="http://www.serff.com/documents/plan_management_data_templates_issuer_ncqa.xls">http://www.serff.com/documents/plan_management_data_templates_issuer_ncqa.xls</a> <u>URAC Accreditation Template</u> <a href="http://www.serff.com/documents/plan_management_data_templates_issuer_urac.xls">http://www.serff.com/documents/plan_management_data_templates_issuer_urac.xls</a>
<b>Non-Discrimination</b>	45 CFR 156.125	Insurer may not, with respect to its QHP, discriminate on the basis of race, color, national origin, disability, age, sex, gender identity or sexual orientation.	Program Attestations. Attestation of compliance with non-discrimination standards.		
<b>Meaningful Difference</b>	Letter to Issuer - April 5, 2013	QHPs must be substantially different from plans offered by the same issuer in the same state in terms of plan type (HMO, PPO, etc), market type (individual or SHOP) metal level, service area coverage, provider networks, premiums, cost sharing, benefits offered, or formulary structure. This will ensure that consumers can make an informed selection among plan choices that the consumer can readily differentiate and compare, and that one issuer does not impede competition by submitting a number of very similar QHPs that monopolize virtual 'shelf space.	Program Attestations. Attestation of compliance with meaningful difference standards.	Meaningful Difference Justification.	<u>Meaningful Difference Justification</u> <a href="http://www.serff.com/documents/plan_management_data_instructions_ch13h.pdf">http://www.serff.com/documents/plan_management_data_instructions_ch13h.pdf</a> <u>Letter to Issuers</u> <a href="http://ccio.cms.gov/resources/regulations/Files/2014_letter_to_issuers_04052013.pdf">http://ccio.cms.gov/resources/regulations/Files/2014_letter_to_issuers_04052013.pdf</a>
<b>SHOP Tying (Required for all insurers)</b>	45 CFR 156.200(g)	Insurers who have greater than 20 percent share of the small group market must offer at least one silver-level and one gold-level QHP through the SHOP Exchange as a condition of participation in the individual Exchange	Program Attestations. Attestation of compliance with SHOP tying provision.	SHOP Tying justification. Justification from all insurers on how they are complying with the SHOP tying provision.	<u>SHOP Tying Justification</u> <a href="http://www.serff.com/documents/plan_management_data_instructions_ch13j.pdf">http://www.serff.com/documents/plan_management_data_instructions_ch13j.pdf</a>